UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

VIRTAMOVE, CORP.,	CASE NO. 2:24-cv-00093-JRG (Lead Case)
Plaintiff,	
v.	
HEWLETT PACKARD ENTERPRISE COMPANY,	
Defendant.	
VIRTAMOVE, CORP.,	CASE NO. 2:24-cv-00064-JRG (Member Case)
Plaintiff,	
v.	
INTERNATIONAL BUSINESS MACHINES CORP.,	
Defendant.	

DEFENDANT'S NOTICE OF DESIGNATION OF LEAD COUNSEL

COMES NOW, Defendant International Business Machines Corp. ("IBM") hereby notifies the Court and all parties of record that Todd M. Friedman, Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, is designated as lead counsel for Defendant IBM in the above-captioned case.

Dated: April 17, 2024 Respectfully submitted,

/s/ Todd M. Friedman

Todd M. Friedman (pro hac vice) KIRKLAND & ELLIS LLP 601 Lexington Avenue New York, NY 10022 Telephone: (212) 446-4800 Facsimile: (212) 446-4900

Email: todd.friedman@kirkland.com

Brandon H. Brown State Bar No. 266347 KIRKLAND & ELLIS LLP 555 California Street San Francisco, CA 94104 Telephone: (415) 439-1400 Facsimile: (415) 439-1500

Email: brandon.brown@kirkland.com

Of Counsel:

Andrea L. Fair
Texas State Bar No. 24078488
Email: andrea@wsfirm.com
WARD, SMITH & HILL, PLLC
1507 Bill Owens Parkway
Longview, TX 75604
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)

Attorneys for Defendant International Business Machines Corp.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on April 17, 2024.

/s/ Todd M. Friedman

Todd M. Friedman